

Equality Screening and Impact Assessment

INTRODUCTORY GUIDANCE TO EQUALITY SCREENING AND IMPACT ASSESSMENT

What is it? Equality screening and impact assessment helps us consider the effect of our policies and practices¹ on different people. It helps us minimise negative impact and potential discrimination and promote opportunities to advance equality, inclusion and good relations between different groups of people.

There are two main elements to equality screening and impact assessment. Firstly, a set of equality screening questions are reviewed. These questions help determine whether the policy is relevant to equality and whether it needs to go through an equality impact assessment. The second element, if required, is the equality impact assessment meeting. This is where a panel of people review the proposed policy, particularly thinking about its impact on different groups of people, trying to identify and counter any potential negative impact and promote any opportunities to enhance equality. The panel suggests actions for the policy owner to adopt.

Why do we do it? The process helps us improve our policies and build equality into our work. Equality screening and impact assessment helps us consider the potential impact of what we do on different groups who are susceptible to unjustified discrimination, some of whom are legally protected against this, whether by UK or other law. It helps us demonstrate that we have proactively considered equality when developing our policies.

When should we do it? Assessing the impact on equality should start early in the policy development process, or at the early stage of a review. Assessing the impact on equality should be ongoing rather than a one-off exercise, because circumstances change over time, so equality considerations should be considered both as the policy is developed and as it is implemented. The guidance here is to help assess the impact on equality before the policy is implemented.

It takes some time to properly set up an equality impact assessment meeting if one is needed, so the equality screening questions should be considered as early as possible once the policy is drafted. If an equality impact assessment is required it will take a little time to identify a chair, a note-taker, a diverse panel and to set up the meeting arrangements. In addition, once the meeting has taken place there are likely to be actions to be implemented before the policy is launched. All this needs to be considered when determining the best time to address equality screening and impact assessment.

When we are implementing a policy that has been developed elsewhere, for example by a government department, or by a partner organisation we also need to assess the impact on equality. Although responsibility for the policy itself rests with the organisation that developed it, we may have choices in how it is implemented that can help eliminate potential discrimination and promote equality, inclusion and good relations.

How do we do it? Consider the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it. Reflect on its potential impact on people with different equality categories and think about which aspects of the policy, if any,

¹ Consistent with its broad definition in Section 75 of the Northern Ireland Act and other equality legislation, this guidance uses the term ‘policy’ as a shorthand for policies, practices, activities and significant decisions about how we work and carry out our functions.

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are most relevant to equality. Answer the equality screening questions to determine whether an equality impact assessment meeting is necessary.

Identify someone to chair the equality impact assessment panel meeting, if one is necessary, and someone to take the notes. The chair and note-taker play a crucial role and specific guidance has been developed to support them ([guidance for Chairs](#); [guidance for Note-takers](#)). A diverse panel should be approached, including a range of colleagues from different teams/departments/countries/regions as appropriate, some of whom should be directly involved in or impacted by the policy. Panel members should be sent the part-completed ESIA form and the policy documents, giving them at least a full week to read them and prepare for the meeting.

We particularly focus on the following equality categories (many of which are protected by equality legislation in the UK and beyond): age, dependant responsibilities (with or without), disability, gender including transgender, marital status/civil partnership, political opinion, pregnancy and maternity, race or ethnic origin, religion or belief and sexual orientation. Invariably there are other areas to consider including full-time/part-time working, geographical location, tribe/caste/clan or language, dependent on the country. We also review what is being proposed against the organisation's values (creativity, integrity, mutuality, professionalism and valuing people).

After the meeting the action points identified by the panel are reviewed by the policy owner and implemented as appropriate. The policy owner confirms implementation of the action points (and outlines a justification for any action points that won't be taken forward) and then signs off and sends the completed form to ESIA@britishcouncil.org.

Northern Ireland

There is legislation in Northern Ireland which requires a more detailed process of equality screening and impact assessment for policies that are deemed to have high relevance to equality. This includes external consultation with relevant contacts and organisations. Given this, there is a need to confirm whether the proposed policy affects anyone in Northern Ireland. **If it does, all parts of the form need to be completed and the guidance at Annex A must be read and followed.**

Please note

Before submitting this planning tool, ensure that it has been signed and dated by the policy owner on both the Record of Decision page 4 & Part B section 5. The document will be invalid if not correctly completed.

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EQUALITY SCREENING

POLICY² DETAILS – *Please complete*

Title of policy	Performance Enablement (MyHR)
Name of policy owner	Louisa Bench
Intended implementation date	1st April 2021

BACKGROUND - *Provide brief background information about the policy or change to it. Include rationale, intended beneficiaries and expected outcomes. (Use as much space as you wish, the text box below will expand as you enter information).*

Performance Enablement supported by MyHR moves the British Council from our traditional annual Performance reviews to a continuous performance cycle with how we deliver having equal importance to what is delivered.

The business drivers are set out below, further background is provided in the attached slides:

1. Drive engagement of our workforce through

- *Implementing a performance enablement process that is seen as fair and balanced and technology enabled. The employee and line manager experience are consistent across our global workforce*
- *Building more effective relationships between line managers and their teams through regular conversations that focus on the whole person.*
- *Incorporating feedback from a variety of stakeholders to support performance, coaching and development*
- *Implementing a values-based approach to performance enablement*
- *Utilising technology to better support behavior change eg; with agenda sharing and check-in meeting reminders*
- *Increasing engagement, productivity and success through a new mindset and approach to feedback, reward and recognition*
- *Increase engagement, reduce employee relations caseload, reduce attrition*

2. Increase productivity and compliance through:

- *Implementing easy to use technology that is accessible for all British Council colleagues*
- *Creating a fair, balanced and straightforward global performance enablement process*
- *Reducing HR/Employee/LM/T&D administration time through automation where possible*
- *Improving line managers effectiveness and accountability for their team's performance & development journey*

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3. Drive top line results and align business processes through:

- *Clearly aligning business goals to line manager deliverables and cascading to teams*
- *Differentiating senior executive performance through greater alignment to business performance, values and leadership*
- *Balancing results with how they are achieved (values)*
- *Linking to other processes and systems such as EC and Learning*
- *Utilising data, scorecard and reporting functionality to support business decision making and optimize performance.*

IS AN EQUALITY IMPACT ASSESSMENT REQUIRED?

To determine this, please answer the following by ticking yes, no or not sure:

Question	Yes	No	Not sure
Is the policy potentially significant in terms of its anticipated impact on employees, or customers/clients/audiences, or the wider community?	x		
Is it a major policy, significantly affecting how programmes/services/functions are delivered?	x		
Might the policy affect people in particular equality categories in a different way?	x		
Are the potential equality impacts unknown?	x		
Does the policy have the possibility to support or detract from our efforts to promote the inclusion of people from under-represented groups?	x		
Will the policy have an impact on anyone in Northern Ireland?	x		
Total responses Yes/No/Not sure	6		

DECIDING IF AN EQUALITY IMPACT ASSESSMENT IS NECESSARY

If all the answers to the questions above are 'no' then an equality impact assessment is not needed.

Please move to the 'Record of decision' section below.

If there are any 'yes' responses, then an equality impact assessment is necessary.

Please move to the 'Record of decision' section below.

If there are no 'yes' responses but there are any 'not sure' responses then please discuss next steps further with the Regional Diversity Lead or with the Diversity Unit, who will help you decide if an equality impact assessment is necessary. Examples of situations where it is not necessary to carry out an equality impact assessment include:

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- Producing a team newsletter
- Changing the time of a meeting
- Planning an internal event

In these instances, relevant equality issues should still be considered, but there is no need to carry out an equality impact assessment.

RECORD OF DECISION

I confirm an equality impact assessment is required.

Policy Owner: Louisa Bench Director, Global Talent and Development

Date: 06/01/21

Note 1: *If an equality impact assessment **is required**, please complete questions 1-3 in the following section and send this part-completed form to the panel along with any relevant background documentation about the policy at least one full week prior to the EIA meeting. This should include the draft policy and any supporting data or relevant papers.*

Note 2: *If an equality impact assessment **is not required**, please send this screening section of the form to ESIA@britishcouncil.org.*

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EQUALITY IMPACT ASSESSMENT

PART A: This section is to be completed before the EIA panel meeting and sent at least one week in advance to the panel along with the policy and other relevant documents.

TITLE OF POLICY:	Performance Enablement (MyHR)
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(Take as much space as required under each heading below)

- 1. Please summarise the purpose of the policy, the context in which it will operate, who it should benefit and what results are intended from it.**

MyHR Performance replaces the existing Performance Management system. This will be archived.

In line with feedback from focus groups across British Council and supported by SLT, MyHR will not only replace the current objectives and performance review process but introduce the concept of continuous performance, where employees and managers regularly review and record activity throughout the year and seek feedback from others to support what has been done and how it has been achieved.

The mid- year review in the current process is removed, and year end is a simple summary of evidence from the continuous performance feedback and achievements. The manager will then provide a rating for deliverables and one for values-based behaviour, giving an overall rating for calibration.

The calibration process will not be changed:

Senior Managers can view dashboards/ reports with ratings in their teams, and drill down their hierarchy to view individual objectives and reviews. In the objectives they will see achievements and feedback from continuous performance.

Before confirming and communicating calibrated ratings SBU and Regional management teams will complete the Executive Review to ensure these are consistent and reflect the comparative business results achieved. They will also feedback any concerns regarding distribution of ratings by EDI data provided by employees in MyHR.

See attached slides for more detail.

Benefits intended:

See Background above.

- 2. Please explain any aspects of the policy you've been able to identify that are relevant to equality. This will contribute to the equality-focused discussion the panel will have.**

- Cultural fit of the new approach.
- Technical Accessibility and system for each process step.

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- It is expected that continuous performance and feedback will balance the level of discretionary input from managers and employees in the year end summary.
- It is expected that reflecting the values in feedback and year end summaries, provide further support for inclusion and values-based behaviour.
- The values and value- based behaviour is not in scope of the MyHR Performance Enablement project. An ESIA panel is reviewing this separately.

- 3. Please outline any equality-related supporting data that should be considered. This could include consultation with Trades Union Side or staff associations, equality monitoring data, responses from staff surveys or client feedback exercises, external demographic and benchmarking data or other relevant internal or external material.**

The support to move towards continuous performance and the features being supported by MyHR Performance Enablement was derived from:

- 2017-2019 Employee Survey feedback
- 2019 Global focus group of 245 employees in all regions/SBUs.
- 2019 Consultation with Trades Union
- Best practice in other organisations

Details in attached slides.

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PART B: *This section captures the notes of the Equality Impact Assessment panel meeting.*

TITLE OF POLICY³:	Performance Enablement (MyHR)
DATE OF EIA PANEL MEETING:	19th January 2020 9 - 12.00 UK time/Microsoft Teams

1. Please list the names, roles/business areas and geographical location of the panel members. If contributions have been received in writing by people who could not attend, please list their details too and note 'input in writing' by their name.

- **Louisa Bench:** Director T&D/ Policy Owner (UK). Responsible for Performance Enablement, Leadership management/development, Talent management, eLearning & development.
- **Susana Galvan:** Panel Chair/Country Director (South Africa). Accredited diversity facilitator and been part of many ESIA's.
- **Milena Bahneva:** Local IT Support (Bulgaria). Experienced in Transformation & Implementation rollouts. No previous experience in ESIA.
- **Weerapol Chotikapraklan:** Communication Manger & brand/MyHR champion (Thailand). 1st ESIA.
- **Damian Ross:** Part of E&S team (UK). Participated in 2 ESIA's previously.
- **Saewon Lee:** Regional Change Manager (Korea). Been part of many ESIA's.
- **Murtaza Ali:** Head of HR Operations (Pakistan). Previously involved in ESIA.
- **Catherine Sinclair-Jones:** Country Director (Tanzania)/East Africa Cluster lead for EDI. Gender & Disability facilitator
- **Amanda Hawthorne:** English Teacher & Diversity Coordinator for teaching centres (Spain)/Diversity facilitator. Participated in many ESIA's previously.
- **Jane Wanjohi:** Regional HR & Reward Partner (Kenya). 3rd ESIA.
- **Miriam Desire:** HR Coordinator (Netherlands). No previous experience in ESIA.
- **Linda Khumalo:** Project Manager (South Africa). Part of anti-racism group in SA. 1st ESIA.
- **Sedan Iyidogan Giray:** Head of HR (Turkey)/Part of EDI group, Turkey. 1st ESIA
- **Joe Bardon:** EDI lead/Accredited Diversity facilitator/Student Adviser in Teaching Centre (Japan). Been part of many ESIA's.
- **Furqan Hafiz Bashir:** Head of Equality, Diversity & Inclusion Middle east and North Africa. Accredited diversity facilitator based (Abu Dhabi)
- **Carol Ashen:** Head of Teaching & Learning (Kuwait). 1st ESIA.
- **Derrick Kwaku Afriyie:** HR Reward Manager (SSA) – Absent
- **Nathan Carrol:** L&D and talent Consultant (UK)- Absent
- **Janet Huckvale:** Programme lead Transforming HR
- **Aamir Nazir:** Global head of process improvement
- **Manila Satpathy:** PMO Manager Transforming HR /Note taker.

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2. Summarise the main points made in the discussion, noting which documents were reviewed. Note any points relating to clarity/quality assurance as well as points relating to equality issues.

Introduction:

The chair explained the reasons for conducting an ESIA and mentioned the importance of this policy, that it's a global policy and will affect the whole staff across the organisation. The Chair also reminded everyone that ESIA has a focus on areas of Equality and will be looking at the policy and to see if it has any potential impact from Equality & Inclusion perspective, particularly if there are any areas that might have a negative impact/any opportunity to promote equality and inclusion.

The Policy owner explained why we are making this change, what are the key changes, what will remain same and what will change. She also mentioned that the current way of managing Performance is not quite effective which has only 2 check points (Mid-year & End year) throughout a year and does not have much focus on career development or wellbeing. The new process will shift the focus to the whole person, that is their career development, wellbeing, interest, capability, relationship with colleagues and will have at least 1 check point per month and a minimum of 10 checkpoints in a year (recommended) & the system allows to take notes, add objectives/activities. There will be ratings to measure performance (also looking to change our approach to ratings where we will be using *stars* instead of numbers). She also spoke about the process development, how they conducted focus groups of 230 people including LMs/ leaders across the organisation, carried out external research and benchmarked with external organisations. Values is deemed out of scope as it is separate project and discussions are taking place on Behaviours. They are also working with a global group of stakeholders to ensure the new process works across all cultures.

Queries/Recommendations:

Question1: Was there any consultation with the trade Unions?

Response: We had discussed this with the Trade Unions and had them taken through the change and received very positive feedback. It was commented that some colleagues are not aware of this change, need to close the gaps with colleagues/LMs when the process is completed.

Question2: How colleagues/LMs were selected for consultation and what was the timeline?

Response: The consultations happened throughout 2019. We had contacted HR teams across the globe and focus groups were nominated/people were asked to volunteer. The project was meant to continue throughout 2020 but had to be put on hold because of Covid-19 and uncertainty around funding, as a result not much progressed and not much consultation happened. Our current performance system is built on obsolete technologies and it's unstable, so there is a chance that it might fail, and we might need to go back to paper-based approach for next 12 months. We are in a tight timeline and this system needs to be implemented by Apr-21 or else we might have to wait until Apr-22.

Question3: Is there a separate ESIA taking place for the values & behaviours?

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Response: Values & behaviours are not in scope of this project. There is a separate project taking place on values & behaviours, driven by Values steering committee. Values doesn't need to go through an ESIA as its an organisational expectation/culture change. Consultation are going on for Behaviours. It was suggested that if the ESIA isn't happening for behaviour, it needs to be taken out of the paper.

It was commented that there is a Values challenge group who looked at the various equalities categories and hence Values hasn't gone through an ESIA.

Question4: What percentage of teachers/exams staff were involved in consultation? Is there a separate process for teachers/non teachers?

Response: The project team had made a significant effort to invite teachers/exams staff but did struggle to have the right level of participation as most of exams staff/teachers work in non-standard time table.

There isn't a separate process for teachers and non-teachers, but we have had different stakeholder groups for teachers, now merged together. Their concern is more around the big change in a year and ask is if we can pilot it until September for teaching staff rather than going live in April. The observations for teaching can't be attached to the system right now but is planned to be enabled from July. We have also agreed that 3 teaching centres will go live by April and rest of the teaching organisation will switch over by September.

Question5: Has accessibility tests been done on the new system? Also, there is concern around 10 reviews/write-ups in a year for people who are not very good at English language. 10 write-ups might not be a good idea, will need to provide training to the LMs.

Response: MyHR SFs has screen reader capability and we have been checking accessibility as we go. So far everything has hover text on it and available for screen readers. The standards are same across the system. We have been checking all custom tiles and known problem areas. We have confirmation on accessibility for the overall system. For further support, we will be escalating to SAP, if required. We are not doing much customisation and making sure everything is accessible. We have also checked that the text size can be changed as per the need, have hover text throughout and can also zoom in/out. We have checked all parts of the system except the meeting notes section. We need to check whether speech can be recorded directly into the system. We also need to check if there is any functionality for people to fill in the text in whatever language they like and make sure it's accessible. The focus is on having a good quality conversation and the system is there to help to capture the conversation, will be embedded in training for LMs.

Question6: What was the reaction from the LMs around having 10 check-ins in a year? Will it also be applied to the teachers or other roles who have non-standard timetable? It will be challenging for teachers/LMs who are in hourly contracts and will practically won't have enough time.

Response: It will be applicable to everyone including the teachers. We have received very positive feedback from different working groups including teaching & exams. The feedback is that it's a better approach than having just 2 check-ins in a year which will help to have a good quality conversation and will help to build the relationship/understanding between the LM & employee.

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Question7: There should be clear accountabilities from LMs. There is plenty of evidence that the current system is loading much more heavily on the junior colleagues for compliance and being much more relaxed with senior leaders. So, with the new system, how are we going to tackle accountability across the board at all levels?

Response: The system sends reminder if you haven't had a check-in for 30 days (can set the parameters) and can also monitor how many people are having the check-ins. So, we can monitor this and feed it back to SLT to ensure the regular check-ins are happening across the organisation.

Question8: How has the checking/ monitoring process been built into the review the system and how to make sure it's working? Looking at the whole person and considering wellbeing, what kind of training is being put in place to make sure that the LMs are equipped to have the right kind of conversations?

Response: We have a revised role for a line manager which is currently being reviewed and piloted across several regions. EA & MENA are looking at piloting it and it very clearly outlines the responsibilities of a LM. As a people manager, they need to be aware of the wellbeing of people in their team and need to provide the right kind of support by having good quality conversations. That will be a part of recruitment for people managers going forward and will also be part of promotion decisions. This will be applied to anyone managing people regardless of pay band. There are managing & developing people programmes and leading & developing people programmes which we run all the time and run a lot of mini sessions to support the LMs to have good quality conversations, trust-based relationship, remote management for good quality 1:1s. These are 45-minute sessions, happen all the time across different time zones. Also, we are working to build out a comprehensive development and change plan.

Question9: What will happen for the people who are in existing roles. From a mental health perspective, even though there are lots of sessions/discussions happening, LMs don't really have time/opportunity to attend those sessions and people don't really have the skills and training to know how to speak to their LMs about this. So, what can be done to address that?

Response: There is a challenge if the LM doesn't attend the training. We have everything in place for example eLearning, readings, short videos and with Ashridge there is a lot of 10 mins bite size learning, also we are working on and developing lots of bite size eLearning for LMs around wellbeing, mental health and having those conversations. We are doing everything as we can. But it's the line manager's responsibility to take these on board and ensure they are managing their teams properly. Also, from a system perspective, the system enables the managers to see whether they are having regular catch ups or not. It shows how frequently these conversations are happening in a dashboard format. So, it's everyone's responsibility to ensure that those conversations are happening and people in your team have the capability to have good quality conversations.

Question10: There was concern that people don't feel that there is consistency in line management across the organisation and with the system, there is an opportunity here to get consistency around LM's accountabilities. What is role of HR colleagues to make it happen or is it completely up to the LMs?

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Response: Accountability sits with the LMs. We need the SLT members from the top to all the way down to help model this, they need to have regular check-ins with their direct reports.

We already had a conversation with SLT on where the accountability sits and it's with them and they need to drive/model those behavioural changes.

Question11: How does the feedback process work? How is it agreed and by whom? Does the system enable the externals to provide any feedback?

Response: There is 360 feedback process for pay band 8 and above and you can add external customers/partners to the system. But for the feedback that's in Continuous performance, you can only add people internally. The line manager can comment on it and for 360, the LM can withdraw the people who have been invited to provide feedback. But the control is with the individual person, the LM can only add to it and request it. The manager can remove it, but the guidance is that they shouldn't, unless they are discussing with the employee first.

Question12: From a project management perspective, if most of the feedback is gathered externally, how will that feed in?

Response: There is no mechanism to add people externally in our continuous performance system as it's restricted. But you can anyway attach emails, cut & paste or quote things in the system.

Question13: How are we tracking underperformance in the system? How to track the next steps/ is there a way to capture it consistently globally?

Response: We have a global policy managing under performance which doesn't change. We don't plan to have a separate word document to capture as we intend to be using the system to capture the same information. There are two different options to capture performance improvement in the system, one is using Continuous Performance, the other is to have a separate performance improvement plan. We are reviewing both at present. It will be similar to the process that we have now with very clear objectives as to how the performance needs to be improved with clear timelines. There will be regular meetings and the information from those meetings will need to be recorded, Values and Behaviours would also need to be part of it. So overall the policy doesn't change, this has been checked with employee relation team. Currently we are reviewing the system approach on how it will work most effectively on the system.

It was commented that it's important to monitor the information around conversations/underperformance to make sure we are treating people equally across the organisation which we can then compare and break it down by gender, age & ethnicity to look if we have any biases and address any challenges in any areas. Recording performance improvement in the system would support this.

Question14: How to handle conflicts in the system, for example for end year rating, how to object rating or raise concern on the new system?

Response: The process for objecting rating /standard appeal process hasn't changed. There is a comments section on the system where you can disagree with your LM's perspective of your performance and document that on the system. There is an opportunity here to build more evidence from the regular 1:1 check-ins.

Question15: In terms of performance improvement the current process is to review /rate someone in midyear and inform them if their performance is slipping.

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With the new process when there isn't a mid-year review, how to handle that conversation?

Response: If somebody's performance is slipping, the LMs need to mention the rating. They should have that conversation immediately and understand what's reason behind it and see if there is anything that can be done to support that person. That might result in less performance improvement situations as we are picking things in real-time and having those whole person conversations.

Question16: Is there an option to standardise junior roles and regulate issuing of the ratings across the organisation?

Response: Standardisation of deliverable is an option on the system. This is not mandated. We can do this for certain groups if required. We will look into it in future if required. We might use it to standardise things like LMs deliverables or an EDI deliverable.

Regulation of rating is a part of the calibration process. We are not going to mandate the standardisation of things. The ratings stay the same, but will get flipped 1 becoming 5 etc, will be moving to stars instead of numbers.

Question17: How would the calibration process work and who will be involved in that process? In the current system, this is one of the areas where a lot of bias is taking place.

Response: We are not reviewing the calibration process as we don't have time to do a full review or consultation and because it won't change this year. The calibration process will stay same this year. We need to have in depth consultations and review it once we have implemented the new system. So, there will be a new process for 21/22.

In addition to above, the senior manager will be able to drill down through the hierarchy and see all levels reporting to them and check what kinds of objectives are set /ratings etc before reaching calibration.

Question18: What are the various goals types and how does team goal work?

Response: For Managers, they will have a set of deliverables for the people in their team and might have a different measure of success. If we set up a standard goal, it will apply to everyone and it won't be editable to the people who these are assigned to. If you assign a team goal, team goals will have common measure of success which they will achieve/ not achieve together. Individual feedbacks/ratings can be given and can be updated in continuous performance for both personal, team and fixed global objectives.

Question19: What plans do we have to enable the behavioural shift across all cultures?

Response: We are looking to embed that behaviour change and develop the capability. We have got bite size workshops running around effective 1:1s, need to do more work around toolkits and templates so that the LMs and individual team members can use while having those conversations. Working with global talent and development teams and taking their inputs to build the materials that will work across cultures. It was suggested to do in depth consultation due to the lots of discussion that are happening due to Covid and surveys, the need to put more emphasis on human aspects, Values and Behaviours as we are working in a

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different circumstance now with childcare, working from home and so on. We are getting those feedbacks from our stakeholder groups.

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3. **Capturing information about the protected groups/characteristics** - Based on the notes of the discussion (section above), record here any potential for negative impact identified and any opportunity to promote equality, inclusion and good relations.

Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different ages (older, middle-aged, young adult, teenage, children; authority generation; vulnerable adults)	There is some potential for negative impact.	There is an opportunity to promote equality with the new system. As people get old, they become quieter in terms of handing difficult situations. So, having 10 check-ins in a year for older people might be a challenge. There might be a technical difficulty as people with different age groups have difficulty in dealing with new technical solutions. We are doing some consultations with stakeholder groups to address the gaps.
Different dependant responsibilities (childcare, eldercare, care for disabled and/or extended family)	There is some potential for negative impact.	There isn't any potential for negative impact from system perspective, but there might be some due to policy/procedure. In this current circumstance when everyone is WFH, colleagues who have difference dependent responsibilities, the LM's perception is that might impact their performance. But regardless of the change in process, this is a perception that need to be changed. We can arrange some training for LMs on how to use those behaviours and how to use the appeal process. Also monitoring Values & Behaviour and getting feedbacks from colleagues on demonstrating those behaviours would help. There is an opportunity to promote equality & inclusion with the new system.
Disabled people (physical, sensory, learning, hidden, mental health, HIV/AIDS, other)	There is some potential for negative impact.	We are doing ongoing checking of accessibility to ensure all parts of system is accessible. But there is some potential for negative impact for people having mental health issues. Sometime good

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Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
		<p>intentions may have a negative impact and will lead to more anxiety. So LMs shouldn't have in-depth conversations with employees having mental health issues and should refer to EAP. There is an opportunity for training for the existing LMs. We are building support material, but don't have enough resources and funding to support. So, training & resources would be important moving forward. We have also put forward the LM & EDI deliverables to make as standardised deliverables. There is an opportunity to promote equality & inclusion with the new system.</p>
<p>Different ethnic and cultural groups (majority and minority, including Roma people, people from different tribes/castes/clans)</p>	<p>There is some potential for negative impact.</p>	<p>Different ethnic and cultural groups might have potential disadvantages, like people from age groups either based on technical knowledge or cultural differences. There are also potential biases around how people are perceived from different ethnicity/cultures. There is some opportunity here to promote equality & inclusion by protecting any potential bias on ethnicity & culture. It would be helpful to have at least one ADF facilitator session in a year, but we only have 13 ADFs globally. So, more discussion needs to happen to formalise the role of ADFs as we have an excellent pool of people.</p>
<p>Different genders (men, women, transgender, intersex, other)</p>	<p>There is some potential for negative impact.</p>	<p>There is an opportunity to promote equality & inclusion with the new system.</p>
<p>Different marital status (single, married, civil partnership, other)</p>	<p>There is some potential for negative impact.</p>	<p>There is an opportunity to promote equality & inclusion with the new system.</p>

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Equality categories (with prompts to guide full consideration)	Potential for negative impact	Opportunity to promote equality, inclusion and/or good relations between different groups
Different political views or community backgrounds (particularly relevant to Northern Ireland)	There is some potential for negative impact.	There is an opportunity to promote equality & inclusion with the new system.
Pregnancy, maternity, paternity and adoption (before/during/after)	There is some potential for negative impact.	There is an opportunity to promote equality & inclusion with the new system.
Different or no religious or philosophical beliefs (majority/ minority/ none)	There is some potential for negative impact.	There is an opportunity to promote equality & inclusion with the new system.
Different sexual orientations (gay, lesbian, bisexual, heterosexual)	There is some potential for negative impact.	There is an opportunity to promote equality & inclusion with the new system.
Additional equality grounds (such as full-time/part-time working, language, geographical location, other ⁴)	There is some potential for negative impact.	There might be some potential negative impact on teachers/non teachers who works in a non-standard timetable. There is an opportunity to promote equality & inclusion with the new system.
British Council values (valuing people, creativity, integrity, mutuality, professionalism)	There is some potential for negative impact.	There is an opportunity to promote equality & inclusion with the new system.

Action identified by Panel	Agreed by Policy Owner (Yes/No)	Justification if not agreed	Date to be implemented	Confirmation of implementation
Confirmation required on ESIA for Values & Behaviours, remove the note	Yes	n/a	n/a	There will be a separate ESIA for Behaviours. Values and behaviours are

⁴ Any other categories people share that might impact on how the policy affects them.

Equality Screening and Impact Assessment

<p>in the submission if the panel is not happening.</p>				<p>out of scope from this project. Also mentioned above in Part A, question 2.</p>
<p>Provide confirmation of consultation with trade unions has happened and gaps to close, if there are any.</p>	<p>Yes</p>	<p>n/a</p>	<p>n/a</p>	<p>Nathan had a meeting with trade unions and their initial concerns were addressed. There was an ask to have a round table with Sanjay, but no further response was received to discuss this any further. Nathan had also met Esther w/c 8th Feb – but no queries/concerns were raised.</p>
<p>There is a big piece of work around accountability especially senior leadership and ensuring that everybody gets onboard with the new system and monitor that the check-ins are happening. Must ensure this happens.</p>	<p>Yes</p>	<p>n/a</p>	<p>11/02/21</p>	<p>SLT is currently reviewing the new approach. Decision has been taken to make the check-ins optional for the 1st year. Regular check-ins will be encouraged, but not mandatory.</p>

Equality Screening and Impact Assessment

<p>Ongoing check on accessibility on all parts of the system. Check whether speech can be recorded directly into the system. Also check if there is any functionality for people to fill in the text, whatever language they choose and make sure it's accessible.</p>	<p>Yes</p>	<p>n/a</p>	<p>11/02/21</p>	<p>Speech can't be recorded, but people can fill in information in their local language. Implemented.</p>
<p>Confirm the mechanism to reduce any potential bias in the feedback process.</p>	<p>Yes</p>	<p>n/a</p>	<p>n/a</p>	<p>This should be a joint accountability between the manager and the employee to review feedback and feedback givers and then the focus group to review if there are any concerns. If somebody complains, the manager needs to remove any inappropriate feedback and necessary action to be taken. Also, training can be provided in cultural awareness.</p>
<p>Review the calibration process and ensure there is ESIA when the process is updated as it's an important part of the system.</p>	<p>Yes</p>	<p>n/a</p>	<p>Dec'21</p>	<p>We will review the Calibration process after the system goes</p>

Equality Screening and Impact Assessment

				live, will be completed by Dec'21.
Confirm equality data to be available for calibration.	Yes	n/a	n/a	Equality data is already there.
There are areas of equalities with potential for negative impact due to change in policy, especially behaviour across cultures and mental health issues. Update the panel on training & resources being put in place to support these challenges ongoing.	Yes	n/a	Dec'21	We will need further feedback after the system has gone live. This will be reviewed again in Dec'21.
Take part in reviews to formalise the role of ADF supporting the above area, as we have a good pool of people.	Yes	n/a	n/a	Will expect to see this in the anti-racism taskforce plan which is in design currently. Require joint ownership with Antiracism task force.
Ongoing consultation is needed (with clear transparency and data around it) in this process, considering the magnitude and importance of it, and the fact that the last consultation was in 2019 (and so much has changed in the organisation and the world since then). Also suggested the possibility of a follow up ESIA/Review in 12+	Yes	n/a	n/a	We will continue to run consultations. Will plan the 2 nd ESIA/review next year.

Equality Screening and Impact Assessment

months' time after implementation, perhaps in April or May 2022.				
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4. Agreed actions - *Insert additional rows for more action points and number these.*

5. Sign off by policy owner

I confirm that the policy has been amended as identified in the **Agreed actions** table above.

If the policy has an impact on people or functions in Northern Ireland, I confirm Annex A has also been completed.

_____ Louisa Bench _____ (Name) _____ HR Director T&D _____ (Role)
_____ 11/02/2021 _____ (Date)

6. Record keeping

The Policy Owner (or their agent) must email the completed ESIA form to ESIA@britishcouncil.org.

Equality Screening and Impact Assessment

ANNEX A

POLICIES WITH AN IMPACT IN NORTHERN IRELAND

In accordance with the Guide for Public Authorities, policies which have a MAJOR impact on equality will share some of the following factors:

- they are deemed to be significant in terms of strategic importance;
- the potential equality impacts are unknown;
- the potential equality and/or good relations impacts are likely to be adverse or experienced disproportionately by groups who are marginalised or disadvantaged;
- the policy is likely to be challenged by a judicial review;
- the policy is significant in terms of expenditure.

Policies which have a MINOR impact on equality will share some of the following factors:

- they are not unlawfully discriminatory, and any residual potential differential impact is judged to be negligible;
- aspects of the policy are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making the changes identified in the action points at Section 4;
- any differential equality impact is intentional because the policy has been designed specifically to promote equality for groups of disadvantaged people;
- by amending the policy there are opportunities to better promote equality, inclusion and/or good relations.

Policies which have NO impact on equality will share some of the following factors:

- they have no relevance to equality, inclusion or good relations;
- they are purely technical in nature and have no bearing in terms of the impact on equality, inclusion or good relations for people in different equality groups.

For policies impacting on people or functions in Northern Ireland, you must identify whether any of the issues identified by the EIA panel in the table at Section 3 are likely to have a MAJOR, MINOR or NO impact on equality. This consideration must be given to all the items listed in the table at section 3 whether they have potential for negative impact or the opportunity to promote equality, inclusion and good relations.

Equality categories	Negative/Positive impact on equality, inclusion or good relations		
	NO	MINOR	MAJOR
Age			
Dependants			
Disability			
Ethnicity			
Gender			
Marital status			
Political opinion			
Religious belief			
Sexual orientation			

If the answer to the above questions is NO, no further action is needed.

Equality Screening and Impact Assessment

If MINOR impact is identified and the actions listed at Section 4 will address this, no further action is needed. Where the actions listed at Section 4 will not sufficiently address the impact, additional measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations should be considered. If mitigating measures and/or an alternative approach cannot be taken, then the policy should be subject to full Equality Impact Assessment (EQIA) aligned to Northern Ireland's equality legislation.

If a MAJOR impact is identified in any of the answers above, then the policy should be subject to full Equality Impact Assessment (EQIA) aligned to Northern Ireland's equality legislation.

For guidance on completing full EQIA aligned to Northern Ireland's equality legislation, see <http://www.equalityni.org/archive/pdf/S75GuideforPublicAuthoritiesApril2010.pdf>.

A member of the Diversity Unit should be involved in any EQIAs that take place.

RECORD OF DECISION AND SIGN OFF BY POLICY OWNER: *(please delete 2 of the following statements)*

I confirm that a full EQIA is needed and that I will refer to the Guide for Public Authorities and the Diversity Unit for support in carrying this out.

or

I confirm that a full EQIA is not needed, providing all the Agreed actions at Section 4 and/or other noted mitigating actions are carried out.

Note other mitigating actions that are not listed at Section 4 here _____

or

I confirm that a full EQIA is not needed and no further action needs to be taken.

Signed by:

_____ (Name) _____ (Role)

_____ (Date)

RECORD KEEPING

The Policy Owner (or their agent) must email the completed ESIA form to ESIA@britishcouncil.org.